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May 23, 2018

VIA ECF ONLY

Honorable Ann Marie Donio, USMJ
United States District Court
Mitchell H. Cohen U.S. Courthouse
One John F. Gerry Plaza
Camden, New Jersey 08101

Re: Sosinavage v. The County of Camden, et al.
Docket No.: 14-cv-3292-JBS-AMD

Carmichael v. The County of Camden, et al.
Civil Action No. 1:14-cv-3323-JBS-AMD

Dear Judge Donio:

We represent the County defendants in the above matter. We received plaintiffs' counsel's May 21, 2018 letter to the Court now requesting production of additional Internal Affairs ("IA") files for 2012 and 2013. We submit this initial letter in response as to the procedural issues related to any further production that the Court might order. We reserve the right to submit substantive arguments to the Court as to the relevance of the request and whether it should be granted.

First, as a preliminary matter, plaintiff's counsel has already spent 3 entire days doing an inspection of the IA files produced to date and it is projected that this will take at least another 7-10 days.

Second, there are a total of approximately 500 additional IA files, for these additional years (405 IA files for 2012 and 84 IA files for 2013). Thus, this will again require the County to expend substantial time and resources to collect the files, organize them for production and have an officer present during the entire time. At this time, the County is in the midst of a hiring period which requires substantial time and effort related to background checks, etc. The County would need at least 3-4 weeks to be able to have these files ready for production.

Respectfully submitted,

BROWN & CONNERY, LLP

s/ Christine P. O'Hearn
Christine P. O'Hearn

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cc: Cheryl L. Cooper, Esquire (*via ECF only*)
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Paul Brandes, Esquire (*via ECF only*)